

**REMARKS**

**STATUS OF CLAIMS**

Claims 1-2, 4-6, 8-11, 13-15, 17-20, 22-24, 26 and 27 have been pending.

Claims 1-2, 4-6, 8-11, 13-15, 17-20, 22-24, 26 and 27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Raghunandan, U.S. Patent No. 6,721,785, hereinafter referred to as "Raghunandan," in view of Brezin et al., U.S. Patent No. 7,039,639, hereinafter referred to as "Brezin," in further view of Haynes, U.S. Patent No. 6,574,671, hereinafter referred to as "Haynes."

In accordance with the foregoing, the claims are amended and new claim 28 is added, and, thus, the pending claims remain reconsideration, which is respectfully requested.

No new matter has been added.

The Examiner's rejections are respectfully traversed.

**REQUEST FOR INTERVIEW:**

Applicants respectfully request the Examiner contact the undersigned to schedule an interview at the Examiner's earliest convenience.

**CLAIM REJECTIONS:**

Independent claims 1, 10 and 19 are allegedly unpatentable over Raghunandan, in view of Brezin, in further view of Haynes.

According to the foregoing, the claims are amended for clarity, to recite, "a first detection module detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery; a setting module setting an input count of the detected multicast target mail destination addresses in the history; a generating module generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery, said group capable of including destination addresses of various destination attributes, when the input count of the detected multicast target mail destination addresses reaches a predetermined number corresponding to the detection; and an adding module adding a group name corresponding to the plurality of multicast target mail destination addresses of the destination attributes of the generated group to group management information stored in the E-mail device," as recited, for example, in claim 1. Support for the claim amendment can be found, for example, in FIGS. 3 and 4 and page 8, line 8-24 in the application specification.

The Office Action asserts that Raghunandan, at column 1, line 65 to column 2, line 5 and column 4, lines 48-55, discloses the claimed "first detection module detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery."

Applicants respectfully disagree with the assertion, because Raghunandan, at column 1, line 65 to column 2, line 5 recites:

Very often, a recipient or group of recipients who are frequently contacted, are identified by an alias (a name string) in order to facilitate identification and/or reduce the burden of repeatedly entering the individual email addresses. An alias may correspond to a group of email addresses and may further make reference to other aliases. In this manner a complex hierarchy of aliases can be established.

In other words, Raghunandan at column 1, line 65 to column 2, line 5 discusses that a user can set up an email group to reduce the burden of repeatedly entering the individual email addresses.

Further, Raghunandan, column 4, lines 48-55, recites:

computer readable code devices for application of each said parsed transmission control directive on said identified list or lists of recipients so as to exclude or include a recipient or a group of recipients in said identified list or lists, in accordance with rules based on requirements of implementation.

The said computer readable code devices for provision of transmission control directives by the user comprising:

In other words, Raghunandan discusses that a rule can be implemented to include or exclude a recipient from a group.

However, Applicants respectfully submit that Raghunandan fails to disclose the claimed "detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery," as recited in claim 1, because Raghunandan merely discloses email groups. That is, according to the embodiment of claim 1, the claimed "first detection module" detects that a plurality of emails addressed to a plurality of destination addresses exist in a mail delivery history. Raghunandan at column 1, line 65 to column 2, line 5 and column 4, lines 48-55 merely discusses email groups, thus, Applicants respectfully submit Raghunandan fails to disclose, either expressly or implicitly, the claimed "detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery," as recited in claim 1.

The Office Action further asserts that Raghunandan, at column 5, lines 60-67, column 6, lines 10-20, and column 2, lines 1-5, disclose the claimed "generating module generating a

group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery" as recited, for example, in claim 1.

Applicants respectfully disagree with the assertion, because Raghunandan, at column 2, lines 1-5, recites:

An alias may correspond to a group of email addresses and may further make reference to other aliases. In this manner a complex hierarchy of aliases can be established.

In other words, Raghunandan discusses that an email group may contain other email groups.

Furthermore, Raghunandan, at column 5, lines 60-67, recites:

FIG. 3 shows the email system including parsing unit, expansion unit and exclusion/inclusion unit in Ram (2) of the apparatus. The Ram (2) also contains alias definition lists. The user (4) provides the transmission control directive through input device (5). The CPU (6) executes the email system program using transmission control directives provided by the user (4) and alias definition list to define the recipients of the email message given by the user.

In other words, Raghunandan, at column 5, lines 60-67 discusses that a computer sends an email according to directives entered by a user.

Furthermore, Raghunandan, at column 6, lines 7-22, recites:

For example consider a situation involving the following four identified lists of recipients:

To: Alias1

Cc: Alias2

Bcc: Alias3

Group: Alias4

Let Alias1 consist of Alias11, Alias12, . . . Alias1n

Let Alias2 consist of Alias21, Alias22, . . . Alias2n

Let Alias3 consist of Alias31, Alias32, . . . Alias3n

Let Alias4 consist of Alias41, Alias42, . . . Alias4n

If one were to send a mail that were to be denied to say: Alias12, Alias22, Alias31 and Alias42 and u1@d1.com which is listed under Alias11 and u2@d2.com which is listed under Alias12 there is no way one can do that with the existing e-mail features without expanding all the aliases and removing the e-mail addresses that need to be denied.

In other words, Raghunandan discusses that there exists a problem when you want to exclude a few email addresses from a large group of email addresses.

Accordingly, Applicants respectfully submit that Raghunandan fails to disclose, either expressly or implicitly, the claimed “generating module generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery,” because Raghunandan merely discusses conventional email groups. In other words, Raghunandan fails to disclose, either expressly or implicitly, generating an email group based upon a user’s email history, i.e. the claimed “generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery,” because Raghunandan does not discuss how Raghunandan “Alias’s” are formed. Presumptively, Raghunandan “Alias’s” are likely generated manually by a user, entering all the email addresses into the group once, so that the user can simply refer to the group as a whole in the future. In contrast, the embodiment according to claim 1 provides “generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery,” and, thus, generates groups based on the “plurality of multicast target mail destination addresses detected in said history of mail delivery.”

The Office Action relies upon Haynes and Brezin to disclose “destination attributes” and “a simple frequency count,” respectively, and, thus, Applicants respectfully submit that Haynes and Brezin fails to disclose the claimed “first detection module detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery ... generating module generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery,” as recited, for example, in claim 1.

Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness cannot be based upon Raghunandan, Brezin and Haynes, because there is no evidence one of ordinary skilled in the art would modify Raghunandan, Brezin, Haynes or any combination thereof to include the claimed “first detection module detecting that a plurality of multicast target mail destination addresses exist in a history of mail delivery ... generating module generating a group formed of the plurality of multicast target mail destination addresses detected in said history of mail delivery,” as recited in claim 1, because, at most, Raghunandan, Brezin and Haynes discuss conventional email group generation which requires to set up a group by manually entering all of the email addresses.

Dependent claims recite patentably distinguishing features of their own or are at least patentably distinguishing due to their dependence from the independent claims. Withdrawal of the rejection of pending claims and allowance of pending claims is respectfully requested.

**NEW CLAIM**

New claim 28 is related to a method of automatically generating a group of E-mail addresses, including:

detecting, in a mail delivery history, a plurality of E-mail messages each message addressed to a plurality of E-mail addresses; and

generating a group corresponding to the plurality of E-mail addresses in the detected E-mail message when the detected plurality of E-mail messages each addressed to the plurality E-mail addresses reaches a predetermined number

Accordingly, Applicants respectfully submit that claim 28 patentably distinguishes over the cited references. Support for the new claim can be found, for example, in FIGS. 3 and 4 and page 8, lines 8-24 in the application specification.

**CONCLUSION**

In view of the amendments and remarks presented above, there being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance, and withdrawal of the rejection of pending claims and allowance of pending claims is respectfully requested. An early action to that effect is courteously solicited.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP



Matthew H. Polson  
Registration No. 58,841

Date: August 27, 2007

1201 New York Ave, N.W., 7th Floor  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501